

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-185-E

In re: South Carolina Energy)	PETITION TO INTERVENE
Freedom Act (H. 3659))	
Proceeding to Establish Duke)	
Energy Carolinas, LLC's Standard)	
Offer, Avoided Cost)	
Methodologies, Form Contract)	
Power Purchase Agreements,)	
Commitment to Sell Forms, and)	
Any Other Terms or Conditions)	
Necessary (Includes Small Power)	
Producers as Defined in 16 United)	
States Code 796, as Amended) –)	
S.C. Code Ann. Section 58-41-)	
20(A))	
_____)	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On May 30, 2019, the Commission opened this proceeding pursuant to Act 62, 2019-2020 Gen. Assemb., 123rd Sess. (S.C. 2019), which directs the Commission to establish Duke Energy Carolinas, LLC’s (“the Company”) and other electric utilities’ Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and any other Terms or Conditions necessary to implement this section of Act 62.

2. This petition is timely filed as the Commission has not yet established an intervention deadline for this proceeding.

3. Act 62 further provides that “[a]ny decisions by the [C]ommission shall be just and reasonable to the ratepayers of the electrical utility, in the public interest, consistent with PURPA and the Federal Regulatory Commission’s implementing regulations and orders, and nondiscriminatory to small power producers; and shall strive to reduce the risk placed on the using and consuming public.”

4. Act 62 states that the proceedings “shall include an opportunity for intervention, discovery, filed comments or testimony, and an evidentiary hearing.”

5. CCL is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who receive electricity service from the Company and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of avoided costs. The address of CCL’s main office is 131 Spring Street, Charleston, SC 29403.

6. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South’s energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Company and will be impacted by the decisions made in this

proceeding regarding renewable energy and the recovery of avoided costs. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

7. The Conservation Groups have participated as intervenors in multiple prior proceedings related to the Company's procurement of renewable energy and avoided costs, including but not limited to Docket Nos. 2015-55-E and 1995-1192-E.

8. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding regarding renewable energy, avoided cost calculations, and tariff offerings, and their interests cannot be adequately addressed by any other party. The Conservation Groups seek accurate and fair valuation of the costs avoided by renewable energy resources and the related tariffs proposed through this proceeding, and seek compliance with federal and state law requirements, including the recently passed Energy Freedom Act. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest.

9. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record, and to participate fully in this proceeding by contributing testimony and presenting evidence at the hearing, and through additional participation as appropriate.

Respectfully submitted this 12th day of July, 2019.

s/ J. Blanding Holman, IV

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via electronic mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 12th day of July, 2019.

s/ Emily Selden
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